

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATE OF AMERICA

v.

ALEXIS HIDALGO, *et al*,
Defendants.

Criminal No. 13-10017-JLT

JOINT MOTION TO MODIFY DISCOVERY ORDER

Defendants hereby move through undersigned counsel to modify the discovery schedule set forth at the April 26, 2013 Initial Status Conference in the above-captioned case. During that Status Conference, the government represented that automatic discovery was ongoing and anticipated that it would be completed by close of business on June 14, 2013. Based on that representation, the Court set July 10, 2013 as the deadline by which defense counsel must submit requests for additional discovery pursuant to Local Rule 116.3. However, the government's automatic discovery remains ongoing. Moreover, following the Status Conference, Emma M. Greenwood was appointed Coordinating Discovery Attorney for the defendants. As such, the government is making its discovery productions to Ms. Greenwood first, who organizes those materials and distributes them in turn to the individual defendants.

On July 8, 2013, Ms. Greenwood informed defense counsel, including the undersigned, that she received an additional discovery production from the government on July 5, 2013. Undersigned counsel has not yet received that production, and therefore has not had an opportunity to review it.

Based on the foregoing, Defendants request that the Court extend the deadline for requests for additional discovery to thirty (30) days following the date on which Ms. Greenwood produces to Defendants those materials that the government represents to mark the completion of its automatic discovery in the above-captioned case.

Dated: July 9, 2013

Respectfully Submitted,
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LOCAL RULE 7.1(A)(2) CERTIFICATION

I, Emily Schulman, hereby certify that I contacted the government about the proposed modification to the Court's discovery schedule before filing this motion, but have not yet ascertained the government's position on the motion.

/s/ Emily R. Schulman
Emily R. Schulman

CERTIFICATE OF SERVICE

I, Emily Schulman, hereby certify that a true and accurate copy of this document was served via ECF on July 9, 2013 to all registered participants as identified on the Notice of Electronic Filing.

/s/ Emily R. Schulman
Emily R. Schulman